1 2 3 4 5 6 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON AT SEATTLE 7 8 9 CASE NO.: 2:23-cv-01495-JHC FEDERAL TRADE COMMISSION, et al., STIPULATED MOTION AND 10 ORDER TO FILE A CORRECTED Plaintiffs, REDACTED COPY OF EXHIBIT 11 v. 12 AMAZON.COM, INC., a corporation, NOTE ON MOTION CALENDAR: 13 Defendant. June 3, 2024 14 15 16 The parties, by and through their attorneys of record, respectfully request that the Court 17 enter the proposed order set forth below regarding Exhibit B to Plaintiffs' Motion to Compel Production of Documents Related to Spoliation. 18 19 In support of this request, the parties represent the following to the Court: 20 1. On May 31, 2024, the Court ordered that Exhibit B should be publicly filed with Plaintiffs' partial redactions of the document. (Dkt. #243). 21 22 2. The parties met and conferred on June 3, 2024. Amazon identified two additional 23 instances where names should be redacted, and Plaintiffs agree that those 24 STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 1

CASE NO. 2:23-cv-01495-JHC

1	redactions are appropriate. Both of the names in question were redacted	
2	elsewhere in Plaintiffs' proposed redactions.	
3	3. The parties stipulate as follows, subject to Court approval, and jointly request th	ıaı
4	the Court enter the following Order approving this Stipulation.	
5	a. Plaintiffs are directed to file a public version of Exhibit B consistent with	h
6	the Court's May 31, 2024 Order and the additional redactions described	
7	above.	
8	Stipulated to and respectfully submitted this 3rd day of June, 2024, by:	
9		
10		
11	<u>s/ Kara King</u> SUSAN A. MUSSER (DC Bar # 1531486)	
12	EDWARD H. TAKASHIMA (DC Bar # 1001641)	
13	EMILY K. BOLLES (NY Reg. # 5408703) KARA KING (DC Bar # 90004509)	
14	ERIC ZEPP (NY Reg. #5538491) Federal Trade Commission	
15	600 Pennsylvania Avenue, NW Washington, DC 20580	
16	Tel.: (202) 326-2122 (Musser) (202) 326-2464 (Takashima)	
17	Email: smusser@ftc.gov etakashima@ftc.gov	
18	ebolles@ftc.gov kking@ftc.gov	
19	ezepp@ftc.gov	
20	Attorneys for Plaintiff Federal Trade Commission	
21	Commission	
22		
23		
23 24	c/Michael Ic	
24	s/ Michael Jo	

STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 2 CASE NO. 2:23-cv-01495-JHC

1	Michael Jo (admitted <i>pro hac vice</i>) Assistant Attorney General, Antitrust Bureau	Timothy D. Smith, WSBA No. 44583 Senior Assistant Attorney General
2	New York State Office of the Attorney General	Antitrust and False Claims Unit Oregon Department of Justice
3	28 Liberty Street	100 SW Market St
	New York, NY 10005	Portland, OR 97201
4	Telephone: (212) 416-6537	Telephone: (503) 934-4400
	Email: Michael.Jo@ag.ny.gov	Email: tim.smith@doj.state.or.us
5	Counsel for Plaintiff State of New York	Counsel for Plaintiff State of Oregon
6	s/ Rahul A. Darwar	s/Jennifer A. Thomson
	Rahul A. Darwar (admitted <i>pro hac vice</i>)	Jennifer A. Thomson (admitted <i>pro hac vice</i>)
7	Assistant Attorney General	Senior Deputy Attorney General
	Office of the Attorney General of Connecticut	Pennsylvania Office of Attorney General
8	165 Capitol Avenue	Strawberry Square, 14th Floor
	Hartford, CT 06016	Harrisburg, PA 17120
9	Telephone: (860) 808-5030	Telephone: (717) 787-4530
	Email: Rahul.Darwar@ct.gov	Email: jthomson@attorneygeneral.gov
10	Counsel for Plaintiff State of Connecticut	Counsel for Plaintiff Commonwealth of Pennsylvania
11	s/ Alexandra C. Sosnowski	·
	Alexandra C. Sosnowski (admitted pro hac	s/ Michael A. Undorf
12	vice)	Michael A. Undorf (admitted pro hac vice)
	Assistant Attorney General	Deputy Attorney General
13	Consumer Protection and Antitrust Bureau	Delaware Department of Justice
	New Hampshire Department of Justice	820 N. French St., 5th Floor
14	Office of the Attorney General	Wilmington, DE 19801
	One Granite Place South	Telephone: (302) 683-8816
15	Concord, NH 03301	Email: michael.undorf@delaware.gov
	Telephone: (603) 271-2678	Counsel for Plaintiff State of Delaware
16	Email: Alexandra.c.sosnowski@doj.nh.gov	
17	Counsel for Plaintiff State of New Hampshire	s/ Christina M. Moylan Christina M. Moylan (admitted pro hac vice)
1 /	s/ Caleb J. Smith	Assistant Attorney General
18	Caleb J. Smith (admitted <i>pro hac vice</i>)	Chief, Consumer Protection Division
	Assistant Attorney General	Office of the Maine Attorney General
19	Consumer Protection Unit	6 State House Station
	Office of the Oklahoma Attorney General	Augusta, ME 04333-0006
20	15 West 6th Street, Suite 1000	Telephone: (207) 626-8800
	Tulsa, OK 74119	Email: christina.moylan@maine.gov
21	Telephone: (918) 581-2230	Counsel for Plaintiff State of Maine
	Email: caleb.smith@oag.ok.gov	
22	Counsel for Plaintiff State of Oklahoma	
23		
	s/ Timothy D. Smith	s/ Gary Honick
24		
	STIPULATED MOTION AND ORDER TO FILE A CORREDACTED COPY OF EXHIBIT B - 3 CASE NO. 2:23-cv-01495-JHC	RRECTED

1	Gary Honick (admitted <i>pro hac vice</i>)	Lucas J. Tucker (admitted pro hac vice)
	Assistant Attorney General	Senior Deputy Attorney General
2	Deputy Chief, Antitrust Division	Office of the Nevada Attorney General
	Office of the Maryland Attorney General	100 N. Carson St.
3	200 St. Paul Place	Carson City, NV 89701
	Baltimore, MD 21202	Telephone: (775) 684-1100
4	Telephone: (410) 576-6474	Email: LTucker@ag.nv.gov
	Email: Ghonick@oag.state.md.us	Counsel for Plaintiff State of Nevada
5	Counsel for Plaintiff State of Maryland	
		s/ Ana Atta-Alla
6	s/ Michael Mackenzie	Ana Atta-Alla (admitted pro hac vice)
	Michael Mackenzie (admitted pro hac vice)	Deputy Attorney General
7	Deputy Chief, Antitrust Division	New Jersey Office of the Attorney General
	Office of the Massachusetts Attorney General	124 Halsey Street, 5th Floor
8	One Ashburton Place, 18th Floor	Newark, NJ 07101
	Boston, MA 02108	Telephone: (973) 648-3070
9	Telephone: (617) 963-2369	Email: Ana.Atta-Alla@law.njoag.gov
1.0	Email: michael.mackenzie@mass.gov	Counsel for Plaintiff State of New Jersey
10	Counsel for Plaintiff Commonwealth of	a / Lafferen Hannana
11	Massachusetts	s/ Jeffrey Herrera Jeffrey Herrera (admitted pro hac vice)
11	s/Scott A. Mertens	Assistant Attorney General
12	Scott A. Mertens (admitted <i>pro hac vice</i>)	New Mexico Office of the Attorney General
12	Assistant Attorney General	408 Galisteo St.
13	Michigan Department of Attorney General	Santa Fe, NM 87501
10	525 West Ottawa Street	Telephone: (505) 490-4878
14	Lansing, MI 48933	Email: jherrera@nmag.gov
	Telephone: (517) 335-7622	Counsel for Plaintiff State of New Mexico
15	Email: MertensS@michigan.gov	
	Counsel for Plaintiff State of Michigan	
16		s/Zulma Carrasquillo-Almena
	s/Zach Biesanz	Zulma Carrasquillo (admitted pro hac vice)
17	Zach Biesanz (admitted pro hac vice)	Assistant Attorney General
	Senior Enforcement Counsel	Antitrust Division
18	Office of the Minnesota Attorney General	Puerto Rico Department of Justice
1.0	445 Minnesota Street, Suite 1400	P.O. Box 9020192
19	Saint Paul, MN 55101	San Juan, Puerto Rico 00901-0192
20	Telephone: (651) 757-1257	Telephone: (787) 721-2900
20	Email: zach.biesanz@ag.state.mn.us Counsel for Plaintiff State of Minnesota	Email: zcarrasquillo@justicia.pr.gov Counsel for Plaintiff Commonwealth of Puerto
21	Counsel for 1 lainly state of Minnesola	Rico
41		Rico
22		
23		
	s/ Lucas J. Tucker	s/ Stephen N. Provazza
24		
	STIPLIL ATED MOTION AND ORDER TO FILE A COL	RRECTED

STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 4 CASE NO. 2:23-cv-01495-JHC

1	Stephen N. Provazza (admitted <i>pro hac vice</i>)
	Special Assistant Attorney General
2	Chief, Consumer and Economic Justice Unit
	Department of the Attorney General
3	150 South Main Street
	Providence, RI 02903
4	Telephone: (401) 274-4400
_	Email: sprovazza@riag.ri.gov
5	Counsel for Plaintiff State of Rhode Island
6	s/ Sarah L.J. Aceves
0	Sarah L. J. Aceves (admitted <i>pro hac vice</i>)
7	Assistant Attorney General
′	Public Protection Division
8	Vermont Attorney General's Office
0	109 State Street
9	Montpelier, VT 05609
	Telephone: (802) 828-3170
10	Email: sarah.aceves@vermont.gov
	Counsel for Plaintiff State of Vermont
11	
	s/ Laura E. McFarlane
12	Laura E. McFarlane (admitted <i>pro hac vice</i>)
	Assistant Attorney General
13	Wisconsin Department of Justice
	Post Office Box 7857
14	Madison, WI 53707-7857
	Telephone: (608) 266-8911
15	Email: mcfarlanele@doj.state.wi.us
1.0	Counsel for Plaintiff State of Wisconsin
16	
17	
17	
18	
10	
19	
17	
20	
20	
21	
22	
23	

STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 5 CASE NO. 2:23-cv-01495-JHC

24

1	MORGAN, LEWIS & BOCKIUS LLP
2	By: <u>s/ Patty A. Eakes</u> Patty A. Eakes, WSBA #18888
3	Molly A. Terwilliger, WSBA #28449 1301 Second Avenue, Suite 2800
4	Seattle, WA 98101 Phone: (206) 274-6400
5	Email: patti.eakes@morganlewis.com molly.terwilliger@morganlewis.com
6	
7	WILLIAMS & CONNOLLY LLP
8	Heidi K. Hubbard (<i>pro hac vice</i>) John E. Schmidtlein (<i>pro hac vice</i>)
9	Kevin M. Hodges (pro hac vice) Jonathan B. Pitt (pro hac vice)
10	Carl R. Metz (pro hac vice)
11	Carol J. Pruski (pro hac vice) Katherine Trefz (pro hac vice)
12	680 Maine Avenue SW Washington, DC 20024
13	Phone: (202) 434-5000 Email: hhubbard@wc.com
14	khodges@wc.com jpitt@wc.com
15	cmetz@wc.com cpruski@wc.com
16	ktrefz@wc.com
17	COVINGTON & BURLING LLP
18	Thomas O. Barnett (pro hac vice)
19	Katherine Mitchell-Tombras (pro hac vice) One CityCenter
20	850 Tenth Street, NW Washington, DC 20001-4956
21	Phone: (202) 662-5407 Email: tbarnett@cov.com
22	kmitchelltombras@cov.com
23	
24	

STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 6 CASE NO. 2:23-cv-01495-JHC

1	WILKINSON STEKLOFF LLP
2	Kosta S. Stojilkovic (<i>pro hac vice</i>) 2001 M Street NW, 10th Floor
3 4	Washington, DC 20036 Phone: (202) 847-4045 Email: kstojilkovic@wilkinsonstekloff.com
5	Attorneys for Defendant Amazon.com, Inc.
6	
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 7 CASE NO. 2:23-cv-01495-JHC

1	ORDER
2	IT IS SO ORDERED.
3	DATED this 4th day of June, 2024.
4	John H. Chun
5	JOHN H. CHUN UNITED STATES DISTRICT JUDGE
6	UNITED STATES DISTRICT JUDGE
7	
8	
9	
10	
11	
12	
13	
14	
15	
16	
17	
18	
19	
20	
21	
22	
23	
24	

STIPULATED MOTION AND ORDER TO FILE A CORRECTED REDACTED COPY OF EXHIBIT B - 8 CASE NO. 2:23-cv-01495-JHC